DELAWARE PUBLIC SERVICE COMMISSION
DOCKET 06-241
PUBLIC COMMENT

Wednesday, August 30, 2006
Mr. Robert Howatt
Public Service Commission
861 Silver Lake Blvd.
Cannon Building, Suite 100
Dover, DE 19904
robert.howatt@state.de.us

Subject: Request for Proposal (RFP) for the construction of new generation resources in Delaware - August 18, 2006 Public Workshop comments

Dear Mr. Howatt,

My wife and I would like to submit comments on subject Public Workshop conducted by Delaware's Public Service Commission.

It is extremely disturbing to us that the point system being proposed for evaluation of new power plants places 60% of its score on economic considerations and only 40% on non-economic issues. We believe that both Delaware's environment and the health of its citizens should be scored with the highest level of importance in the final evaluation criteria adopted.

Citizen health should be a primary concern in any scoring system, especially for citizens living in the vicinity of the power plants. The hazardous pollutants from coal-fired power plants need to be drastically reduced.

To reduce the risk mercury poses to people's health, the EPA reported to Congress, in December 2000, the necessity of controlling mercury emissions from coal-fired power plants, which are the largest source of human-caused mercury emissions in the U.S. -- about 43 tons of mercury each year.

EPA data for electric utilities in 2000 gives total on-site mercury compound stack air emissions of 229.5 pounds for Sussex County (91.6% of county total), and 137.9 pounds for New Castle County (72.7% of county total).

Mercury is the toxic of greatest EPA concern among the hazardous air pollutants emitted from coal-fired power plants. It can be deposited locally, near the source, or it can travel great distances. Mercury concentrations in the air are usually low and of little direct concern. However, once mercury enters water – either directly or through deposition from the air – biological processes transform it into methylmercury, a highly toxic form of mercury that bioaccumulates in fish and other animals that eat fish. When a substance bioaccumulates, its concentration increases as it moves through the food chain. Human exposure to mercury occurs primarily through consumption of contaminated saltwater or freshwater fish. Mercury contamination in large, predatory fish can be thousands of times higher than concentrations in the water.

The EPA says mercury exposure has been associated with both neurological and developmental damage in humans, and that the developing fetus is the most sensitive to mercury's effects. Children of women exposed to relatively high levels of methylmercury during pregnancy have exhibited a variety of abnormalities, including delayed onset of walking and talking, cerebral palsy and reduced neurological test scores. Children exposed to far lower levels of methylmercury in the womb have exhibited delays and deficits in learning ability. In addition, children exposed after birth potentially are more sensitive to the toxic effects of methylmercury than adults, because their nervous systems are still developing.

According to the EPA, there are cost-effective ways of controlling mercury emissions from power plants with technologies available today and expected to be available in the near future that can eliminate most of the mercury from utilities at a cost far lower than one percent of utility industry revenues.

In addition to health hazards associated with mercury, sulfur dioxide gas emissions from coal-fired power plants have been identified as adversely affecting human health throughout the U.S. and especially people living in the shadow of power plant smokestacks, where impacts are highest. Power plants are the predominant source of sulfur dioxide, emitting 67 percent the emissions in the U.S.

According to the California Office of Environmental Health Hazard Assessment, sulfur dioxide has been associated with health effects ranging from asthma attacks to premature death. It is an irritant that has been shown to exacerbate respiratory disease such as asthma, coughing, wheezing, shortness of breath, and to reduce lung function in general.

It was hypocritical for Delaware to ban smoking inside public buildings and then fail to join neighboring northeastern states in a regional joint attorneys general class action lawsuit to stop the Bush administration from changing Environmental Protection Agency rules that will allow power plants to increase toxic emissions.

Nonsmokers can choose to avoid bars and restaurants that allow smoking, but no segment of Delaware's population can escape the effects of air-borne pollution that travels from state-to-state and nation-to-nation in the atmosphere. According to the Journal of Geophysical Research, scientists recently reported that mercury from coal-burning industries in China travels to the U.S. where it falls in rain.

Delaware's Public Service Commission has no excuse for not initiating action that will reduce the hazardous air pollutants from Delaware's coal-fired power plants to levels comparable or lower than the pollution discharge levels allowed in neighboring states.

Top cleanup priority should be focused on the 1950's vintage Indian River Power Plant, located near Millsboro and Dagsboro on the biggest tributary flowing into the environmentally sensitive Inland Bays. This plant has been identified as the state's largest overall polluter with more than 2.6 million pounds of air emissions in 2000. The magnitude of this state permitted continuous pollution staggers the imagination and is a grave public health concern.

Yours truly,